

CARLA A. McCAULEY (State Bar No. 223910)  
carlamccauley@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
Los Angeles, California 90017-2566  
Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)  
robbalin@dwt.com  
LACY H. KOONCE, III (*pro hac vice*)  
lancekoonce@dwt.com  
SAMUEL BAYARD (*pro hac vice*)  
samuelbayard@dwt.com  
GEORGE WUKOSON (*pro hac vice*)  
georgewukoson@dwt.com

DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas, 21st Floor  
New York, New York 10020  
Tel.: (212) 489-8230 Fax: (212) 489-8340  
ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
company; CHINA INTERNATIONAL  
COMMUNICATIONS CO., LTD., a China  
company; TVB HOLDINGS (USA), INC., a  
California corporation; and DISH  
NETWORK L.L.C., a Colorado corporation,  
Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
LIMITED, a Hong Kong company; HUA  
YANG INTERNATIONAL TECHNOLOGY  
LIMITED, a Hong Kong company;  
SHENZHEN GREATVISION NETWORK  
TECHNOLOGY CO. LTD., a China  
company; CLUB TVPAD, INC., a California  
corporation; BENNETT WONG, an  
individual, ASHA MEDIA GROUP INC.  
d/b/a TVPAD.COM, a Florida corporation;  
AMIT BHALLA, an individual;  
NEWTVPAD LTD. COMPANY d/b/a  
NEWTVPAD.COM a/k/a TVPAD USA, a  
Texas corporation; LIANGZHONG ZHOU,  
an individual; HONGHUI CHEN d/b/a E-  
DIGITAL, an individual; JOHN DOE 1 d/b/a  
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
JOHN DOE 5 d/b/a GANG YUE; JOHN  
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
d/b/a GANG TAI WU XIA; and JOHN DOES  
8-10,

Defendants.

Case No.  
**CV 15-1869 SVW (AJWx)**

**DECLARATION OF GEORGE  
P. WUKOSON IN SUPPORT  
OF PLAINTIFFS' MOTION TO  
AMEND DEFAULT  
JUDGMENT AND  
PERMANENT INJUNCTION**

Courtroom: 10A  
Judge: Hon. Steven V.  
Wilson

**DECLARATION OF GEORGE P. WUKOSON**

I, George P. Wukoson, declare as follows:

1. I am an attorney licensed to practice law in the State of New York and before the bars of the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second Circuit. I am an associate with the law firm of Davis Wright Tremaine LLP ("DWT"), counsel to the Plaintiffs in this action, admitted *pro hac vice*.

2. Attached hereto as Exhibit 11 is a true and correct copy of a redline showing proposed changes to the Court's Amended Default Judgment and Permanent Injunction. Also attached are the proposed additions to Exhibits B and C to the Court's order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17th day of April, 2017 in New York, New York.



George P. Wukoson